

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

	)	Case No. 16-05750-hb
Jessica Nicole Smith	)	
	)	Chapter 13
	)	
Debtor	)	
_____	)	

**ANSWER TO MOTION FOR RELIEF FROM STAY**

The Debtor in this matter, by and through her undersigned counsel, answers the Motion To Modify Stay of Elizabeth Vukovich and Mansoor Ghassem (hereinafter referred to as “Movant”) as follows:

1. Debtor denies all the allegations contained in Movant’s Motion unless specifically admitted hereafter.
2. Debtor is informed and believes that Movant is adequately protected pursuant to the terms of the Chapter 13 Plan and should not be entitled to relief from the automatic stay.

WHEREFORE, the Debtor prays that the Motion be dismissed, that she be reimbursed his costs and attorney’s fees associated with the defense of this Motion, and for such other and further relief as this Court may deem just and proper.

Respectfully submitted,

MOSS & ASSOCIATES, ATTORNEYS P.A.

By: /s/ Jason T. Moss

Jason T. Moss

Federal I.D. No 7240

816 Elmwood Avenue

Columbia, South Carolina 29201

(803) 933-0202

Attorney for the Debtor

Columbia, South Carolina  
January 9, 2017

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

	)	Case No. 16-05750-hb
Jessica Nicole Smith	)	
	)	Chapter 13
	)	
Debtor	)	
_____	)	

**Certification of Facts**

In the above-entitled proceeding, in which relief is sought by Elizabeth Vukovich and Mansoor Ghassem from the automatic stay provided by 11 U.S.C. § 362, I do hereby certify to the best of my knowledge the following :

1. Nature of Movant's Interest:

Secured

2. Brief Description of Security Agreement:

See Note and Mortgage Attached to Movant's Motion.

3. Description of Property Encumbered by Stay:

211 Belair Rd. North Augusta, SC 29841

4. Basis for Relief.

None, Movant is adequately protected under the terms of the Chapter 13 Plan.

5. Prior Adjudication by Others Courts, copy attached

N/A

6. Valuation of Property, copy of Valuation attached:

Fair Market Value      \$NA

Liens                      \$NA

Basis for Valuation      Tax Appraisal

Net Equity                -0-

7. Amount of Debtor's Estimated Equity:      -0-

8. Month and Year in which First Direct Post-petition Payment Came Due to Movant:

9. (A) for Movant/Lienholder: List or attach a list of all post petition payments received directly from debtor(s), clearly showing date received, amount, and month and year for which each such payment was applied: N/A
- (B) For Objecting Party: List or attach a list of all post-petition payments included in the Movants list form (a) above which objection party disputes as having been made. Attach written proof of such payment(s) or a statement as to why such proof is not available at the time of filing this objection.
10. Month and Year for Which Post-petition Account of Debtor(s) is Due as of the Date of this Motion.

MOSS & ASSOCIATES, P.A.

By: /s/ Jason T. Moss  
Jason T. Moss  
Federal I.D. No 7240  
816 Elmwood Avenue  
Columbia, South Carolina 29201  
(803) 933-0202  
Attorney for the Debtor

Columbia, South Carolina

January 9, 2017

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF SOUTH CAROLINA**

	)	Case No. 16-05750-hb
Jessica Nicole Smith	)	
	)	Chapter 13
	)	
Debtor	)	
_____	)	

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that on today's date, I served, on the persons and addresses below, by First Class Mail, postage prepaid, Debtor's Answer to Motion for Relief of Stay and Debtor's Certification of Facts.

Nathan E. Huff Esq.  
228 Baston RD.  
Augusta, GA 30907  
Attorney for Movant

William K. Stephenson  
PO Box 8477  
Columbia, SC 29202  
Chapter 13 Trustee

MOSS & ASSOCIATES, P.A.

By: /s/Stanley Rouse  
Stanley Rouse  
816 Elmwood Avenue  
Columbia, South Carolina 29201  
(803) 933-0202  
stanley@mossattorneys.com

Columbia, South Carolina

January 9, 2017